

In sum, the Commission should not adopt processing guidelines for children's programming, since: (a) in effect, it would establish a quantification standard, a requirement which does not appear in the Act and which is expressly contrary to the legislative history; (b) it could be counterproductive and result in fewer, less innovative children's educational programs on the air and (c) it is premature. If the Commission nevertheless decides to fashion such a guideline, it would have to encompass all activities which "count" toward a broadcaster's meeting the Act's obligation, including short-form programming and nonbroadcast efforts, and there should be no separate guideline with respect to weekday and weekend programming.

Conclusion

For the foregoing reasons, Capital Cities/ABC urges the Commission to (a) accord adequate credit to short-form programming, (b) reject a "primary/secondary objective" test for educational programming, and (c) reject a processing